

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

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In re:	:	
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THE FINANCIAL OVERSIGHT AND	:	PROMESA
MANAGEMENT BOARD FOR PUERTO RICO,	:	Title III
	:	
as representative of	:	Case No. 17-BK-3283 (LTS)
	:	
THE COMMONWEALTH OF PUERTO RICO <i>et al.</i> ,	:	(Jointly Administered)
	:	
Debtors. ¹	:	
	:	
	X	

**INFORMATIVE MOTION OF OFFICIAL COMMITTEE OF UNSECURED
CREDITORS REGARDING JULY 25-26, 2018, OMNIBUS HEARING**

To the Honorable United States District Judge Laura Taylor Swain:

The Official Committee of Unsecured Creditors of all title III Debtors (other than COFINA) (the “Committee”) hereby submits this informative motion in response to the Court’s *Order Regarding Procedures for Attendance, Participation and Observation of July 25-26, 2018, Omnibus Hearing*, dated July 10, 2018 [Docket No. 3472] (the “Scheduling Order”) and respectfully states as follows:

1. Luc A. Despina of Paul Hastings LLP will appear in person on behalf of the Committee at the Hearing (as defined in the Scheduling Order) in Courtroom 2 of the United

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283 (LTS)) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284 (LTS)) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567 (LTS)) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566 (LTS)) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17-BK-4780 (LTS)) (Last Four Digits of Federal Tax ID: 3747) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

States District Court for the District of Puerto Rico, and address, as necessary, the following matters:

- (a) *Renewed Motion Seeking Entry of Order, Under Bankruptcy Rule 2004, Authorizing Discovery With Respect to Certain Causes of Puerto Rico Financial Crisis Beginning on August 15, 2018* [Docket No. 3066];
 - (i) *Omnibus Reply in Support of Renewed Motion of Creditors' Committee Seeking Entry of Order, Under Bankruptcy Rule 2004, Authorizing Discovery Program With Respect to Certain Causes of Puerto Rico Financial Crisis Beginning on August 15, 2018* [Docket No. 3183];
 - (ii) *Creditors' Committee's Informative Motion Regarding Renewed Rule 2004 Motion and Discovery Items to Be Addressed at July 25, 2018 Omnibus Hearing* [Docket No. 3424];
- (b) *Motion of the Independent Investigator for an Order: (I) Establishing Procedures for Resolving Any Confidentiality Dispute in Connection With Publication of the Independent Investigator's Final Report; (II) Approving the Disposition of Documents and Information; (III) Relieving the Independent Investigator From Certain Discovery Obligations; (IV) Exculpating the Independent Investigator in Connection With the Investigation and Publication of the Final Report; and (V) Granting Related Relief* [Docket No. 3427];
 - (i) *Creditors' Committee's Joinder to Retiree Committee's Limited Objection Regarding Investigator's Exit Plan Motion* [Docket No. 3498];
- (c) *Motion of Official Committee of Unsecured Creditors to Clarify or Amend Fourth Amended Notice, Case Management and Administrative Procedures Regarding*

Disclosure Requirements Pursuant to Federal Rule of Bankruptcy Procedure 2019 [Docket No. 3432];

- (i) *Reply of Official Committee of Unsecured Creditors in Support of Motion to Clarify or Amend Fourth Amended Notice, Case Management and Administrative Procedures Regarding Disclosure Requirements Pursuant to Federal Rule of Bankruptcy Procedure 2019* [Docket No. 3607];
- (d) *Official Committee of Unsecured Creditors' (A) Urgent Motion, Pursuant to Bankruptcy Code Section 105(a), to Compel Debtors to Comply With Interim Compensation Orders and (B) Joinder in Motions of Retiree Committee and COFINA Agent to Compel Compliance With Same* [Docket No. 3604];
- (e) *Commonwealth Agent's Renewed Motion, Pursuant to Bankruptcy Code Section 105(a) and Bankruptcy Rule 9019, for Order Establishing Procedures Governing 5.5% SUT Revenues Collected On or After July 1, 2018* [Adv. Proc. No. 17-257, Docket No. 526];
- (f) Any objections, responses, statements, joinders, or replies to any of the foregoing pleadings; and
- (g) Any statements made by any party in connection with the title III cases or any adversary proceeding pending therein.

2. In addition, Luc A. Despins of Paul Hastings LLP reserves the right, in accordance with the *Order Granting Limited Intervention* [Adv. Proc. No. 18-080, Docket No. 13], to address, as necessary, the issues raised in:

- (a) *Defendants' Notice of Motion Pursuant to Fed. R. Civ. P. 12(b)(1) and 12(b)(6) to Dismiss Plaintiffs' Complaint Dated July 5, 2018* [Adv. Proc. No. 18-080, Docket No. 16];
- (b) *Defendants' Memorandum of Law in Support of Motion Pursuant to Fed. R. Civ. P. 12(b)(1) and 12(b)(6) to Dismiss Plaintiffs' Complaint Dated July 5, 2018* [Adv. Proc. No. 18-080, Docket No. 17]; and
- (c) Any objections, responses, statements, joinders, or replies to any of the foregoing pleadings.

3. In addition, Mr. Juan J. Casillas Ayala of Casillas, Santiago & Torres LLC and one of his co-counsel will also be attending, on behalf of the Committee, the Hearing.

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WHEREFORE, the Committee respectfully requests that the Court take notice of the above.

Dated: July 19, 2018

/s/ G. Alexander Bongartz

PAUL HASTINGS LLP
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- and -

/s/ Juan J. Casillas Ayala

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